

AFFIDAVIT


Whatcom County, Washington

I, Pamela Duckmanton, having been cautioned and sworn, state as follows:

1. I am over 18 and am competent to testify. I make this affidavit based on my personal knowledge.
2. I am a former employee of Ambassador Programs, Inc. (Ambassador). Among other things, Ambassador is licensed to and operates the People to People Student Ambassador Program for People to People, Inc. While employed by Ambassador, I served as a Program Specialist. In that capacity, I was responsible in part for arranging foreign tour operators to select homestay hosts in the destination countries.
3. In the fall of 1998, Ambassador's Ralph Baard and I received a visit from Kevin Hickey and Andrew McLeod of E.I.L., Ltd., (EIL). EIL was (and presumably still is) an overseas travel vendor. EIL was well known in the industry and handled many student trips itself. It was also known for a long-term language program. EIL proposed an itinerary for a trip to the British Isles for the summer of 1999.
4. Eventually Ambassador and EIL came to a business arrangement whereby EIL would become an independent contractor for Ambassador. That is, EIL would select all ground operations for the trip, including ground transportation, hotels, meals, homestay hosts, and sights.
5. EIL became a tour operator for two trips for Ambassador in the summer of 1999. One of those trips was the British Isles excursion that Joel Moyer went on. Mr. Baard and I went over our standards of excellence, which are guidelines that cover overseas trips. One of our standards was that trip participants stay with married couples, preferably those who had children. Trip participants could stay with single parent families so long as the single parent was home to supervise and the children (minimum of two) were of the same approximate age as the participant.
6. I was the program specialist for the British Isles excursion. As such, I was responsible for investigating the itinerary. To that end, I went on a "look and see" trip to the UK in January 1999. I visited with EIL representatives and went to the major sites that the trip participants would visit. I recall going over our guidelines with at least one EIL representative during that trip. The representative did not voice any objection to our guidelines.

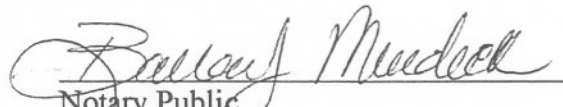


7. Based on my meetings with EIL in Spokane and in the UK, I understood that EIL would not place trip participants with single adults homestay host unless that adult had two children about the same age as trip participants.
8. EIL, not Ambassador, selected Ronald Carroll to be Joel Moyer's homestay host.


Pamela Duckmanton

Sworn and subscribed to in front of me on May 1, 2003.




Notary Public
My Commission Expires: 2-28-2007